

### REMARKS

The foregoing amendments are responsive to the Office Action mailed on June 8, 2006. Claims 1-20 are pending in this application and claims 8-14 and 18-20 have been allowed. By the foregoing amendments claims 1-7 and 15-18 have been amended to clear up ambiguities. Thus, claims 1-20 are presented for examination.

#### Discussion of Amendments to the Specification

The Examiner noted several errors and omissions in the specification. The applicant has amended the specification accordingly by adding Table 1 that was inadvertently omitted from page 35. No new matter has been added; the amendments are supported in the drawings or elsewhere in the specification and by the parent application.

#### Discussion of the Office Action

In the Office Action of June 8, 2006, the Examiner rejected claims 1-7 and 15-17 under 35 U.S.C. §112, first paragraph.

#### Discussion of Rejection of Claims 1-7 and 15-17 under 35 U.S.C. §112, first paragraph

Claims 1-7 and 15-17 stand rejected under 35 U.S.C. §112, first paragraph, for failure to comply with the enablement requirement. According to the Examiner, Applicants have failed to enable a system containing a single battery of cells that was capable of producing a continuous output of deionized fluid.

Applicants emphasize that no undue experimentation is necessary from reading Applicants' specification for one of ordinary skill in the art to make and use a battery of cells as claimed in Applicants' claim 1 and the dependent claims therefrom. Applicants note that the claimed system is described, inter alia, in paragraphs [0020] thru [0024], and [0056] thru [0061], more particularly, the continuous nature of the system as described in paragraph [0023] provides enabling disclosure, especially in combination with paragraph [0061] as well as the entire specification. In any event, Applicants submit that the specification and drawings enable one of ordinary skill in the art to operate the claimed system of claims 1-7

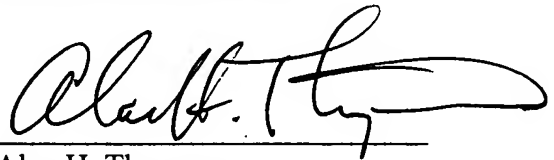
and 15-17 without undue experimentation. Accordingly, the rejection under 35 U.S.C. §112, first paragraph, should be withdrawn.

Summary

Having amended the claims, as discussed above, Applicants respectfully submit that claims 1-20 are in condition for allowance, and Applicant respectfully requests allowance of claims 1-20.

In the event that the Examiner finds any remaining impediment to the prompt allowance of these claims that could be clarified with a telephone conference, he is respectfully requested to initiate the same with the undersigned at (925) 422-7820.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Alan H. Thompson", written over a horizontal line.

Alan H. Thompson  
Attorney for Applicant  
Registration No. 29,981

Dated: August 8, 2006